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Attorneys for Plaintiffs AMAZON.COM, INC.
and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

AMAZON.COM, INC., a Delaware
corporation, and AMAZON TECHNOLOGIES,
INC., a Nevada corporation,

Plaintiffs,

v.

UMER WASIM, *et al.*,

Defendants.

Case No. 3:23-cv-05580-TLT

**DECLARATION OF JEAN M.
FUNDAKOWSKI IN SUPPORT OF
PLAINTIFFS AMAZON.COM, INC. &
AMAZON TECHNOLOGIES, INC.'S
MOTION FOR ADMINISTRATIVE
RELIEF TO FILE OVERLENGTH BRIEF**

Complaint filed: October 30, 2023

1 I, JEAN M. FUNDAKOWSKI, declare under penalty of perjury under laws of the State of
2 California that the foregoing is true and correct.

3 1. I am over the age of eighteen and am competent to testify as to the matters set forth
4 herein. I have personal knowledge of the facts in this declaration, and base this declaration on my
5 personal knowledge.

6 2. I am an attorney for the law firm Davis Wright Tremaine LLP (“DWT”), which
7 represents Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc. (collectively, “Amazon”),
8 in this matter.

9 3. I make this Declaration in support of Amazon’s Request that the Court permit
10 Amazon to exceed, by 15 pages, the 25-page limit applicable to their Motion For Default
11 Judgment Against Defendants: (1) VTLogodesign, Inc.; (2) MK Affiliates, Inc.; (3) Ali Alam; (4)
12 Dynamic Digital Solutions LLC; (5) Mehwash Munir; (6) One Stop Computer Services LLC; (7)
13 Muhammad Zubair Khan; (8) Techtute Inc.; (9) Muhammad Mudassar Anwar; (10) Tech Drive
14 Pvt LLC; (11) Ashhar Rawoof; (12) Smart Startup Solutions, LLC.; (13) Muhammad Usman
15 Khan; (14) Yasir Agar; (15) Muhammad Shiraz Qureshi; and (16) Mavia Nizam.

16 4. Good cause supports this request. Additional pages are required to set forth the
17 required elements of the default judgment motion for the 16 default Defendants listed above,
18 including the Court’s jurisdiction, relevant procedural history, and evidence supporting their
19 liability under the Lanham Act for trademark infringement and cybersquatting; completing the 7-
20 factor Eitel analysis to demonstrate why default judgment is appropriate, *see Eitel v. McCool*, 782
21 F.2d 1470, 1471-72 (9th Cir. 1986); and the rationale and reasoning supporting Amazon’s
22 requests for injunctive relief and statutory damages.

23 5. Notwithstanding this request, Amazon will undertake every effort to be concise
24 and appropriately brief.

25 6. Amazon would have conferred with counsel for the 16 defaulting defendants
26 before submitting this request as required by Local Civil Rule 7-11(a), but none of the 16
27 defaulting defendants have appeared during this proceeding.
28

1 I declare under penalty of perjury under laws of the State of California that the foregoing
2 is true and correct. Executed this 4th day of September, 2024, in San Francisco, California.

3
4 /s/ Jean M. Fundakowski

5 Jean M. Fundakowski
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